



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

Stephen M. Ryan  
Matthew M. Leland  
McDermott Will & Emery LLP  
600 Thirteenth Street, NW  
Washington, DC 20005

RE: MUR 6215  
William Snyder, Michael Alcorn,  
Robert Boyle, Dwayne Miller,  
Greg Gordon, Maizie Pusich

Dear Messrs. Ryan and Leland:

On October 2, 2009, the Federal Election Commission (the "Commission") notified your above-referenced clients of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), and provided your clients with a copy of the complaint.

On July 14, 2010, the Commission found, on the basis of the information in the complaint as well as additional information supplied by the complainant, and information provided by you, that there is no reason to believe William Snyder, Michael Alcorn, Robert Boyle, Dwayne Miller, Greg Gordon, or Maizie Pusich violated 2 U.S.C. § 441f. Accordingly, the Commission closed its file in this matter as it pertains to them. The Factual and Legal Analyses, explaining the Commission's findings, are enclosed.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Tracey L. Ligon, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

Roy Q. Lockett  
Acting Assistant General Counsel

Enclosures  
Factual and Legal Analyses

**FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS**

**Respondent:** William E. Snyder

**MUR:** 6215

The Complaint in this matter alleges violations of the Federal Election Campaign Act, as amended ("Act"), in connection with a fundraiser held in honor of Senator Harry Reid by Tate Snyder Kimsey Architects, Ltd. ("TSKA") on February 17, 2009 ("Reid Fundraiser"). The Complainant, Randy L. Spitzmesser, a former employee and shareholder of TSKA, alleges that Respondents Windom Kimsey and William Snyder, Principals of TSKA, illegally reimbursed him and other individuals for political contributions made to Friends for Harry Reid, the principal campaign committee for Senator Harry Reid ("Reid Committee").

A corporation is prohibited from making a contribution in connection with a federal election, and no officer or director of any corporation may consent to any contribution by the corporation. *See* 2 U.S.C. § 441b(a); 11 C.F.R. § 114.2(b). The Act also prohibits a person from making a contribution in the name of another or knowingly permitting his or her name to be used to effect such a contribution. *See* 2 U.S.C. § 441f; 11 C.F.R. § 110.4.

William Snyder, a Principal and Chairman of the Board at TSKA, contributed \$1,500 to the Reid Committee using his personal American Express card, which he states he paid using personal earnings. *See* Snyder Response at 1-2; Snyder Decl. at ¶ 4. Mr. Snyder states that he did not attend the Reid Fundraiser and was not involved in planning or organizing it. *See* Snyder Response at 1; Snyder Decl. at ¶ 5. In addition, he states that he did not obtain reimbursement for his contribution, or offer, suggest, or discuss reimbursements for contributions to the Reid event with any individual. *See* Snyder Decl. at ¶¶ 6-7. We have no information that would suggest otherwise. Accordingly, the Commission finds no reason to believe that William Snyder violated 2 U.S.C. § 441f.

**FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS**

**Respondent: Michael Alcorn**

**MUR: 6215**

The Complaint in this matter alleges violations of the Federal Election Campaign Act, as amended ("Act"), in connection with a fundraiser held in honor of Senator Harry Reid by Tate Snyder Kimsey Architects, Ltd. ("TSKA") on February 17, 2009 ("Reid Fundraiser"). The Complainant, Randy L. Spitzmesser, a former employee and shareholder of TSKA, alleges that Respondents Windom Kimsey and William Snyder, Principals of TSKA, illegally reimbursed him and other individuals for political contributions made to Friends for Harry Reid, the principal campaign committee for Senator Harry Reid ("Reid Committee").

A corporation is prohibited from making a contribution in connection with a federal election, and no officer or director of any corporation may consent to any contribution by the corporation. *See* 2 U.S.C. § 441b(a); 11 C.F.R. § 114.2(b). The Act also prohibits a person from making a contribution in the name of another or knowingly permitting his or her name to be used to effect such a contribution. *See* 2 U.S.C. § 441f; 11 C.F.R. § 110.4.

Michael Alcorn, the Vice President and Director of Operations at TSKA, attended the Reid Fundraiser and contributed \$1,000 to the Reid Committee prior to the event. *See* Alcorn Response at 1; Alcorn Decl. at ¶¶ 3-7. He states that he made this contribution using a personal check drawn on his personal bank account, and that he was not reimbursed for this or any contribution. *See* Alcorn Response at 1-2; Alcorn Decl. at ¶¶ 6-7. We have no information that would suggest otherwise. Accordingly, the Commission finds no reason to believe that Michael Alcorn violated 2 U.S.C. § 441f.

**FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS**

**Respondent: Robert Boyle**

**MUR: 6215**

15044384676  
The Complaint in this matter alleges violations of the Federal Election Campaign Act, as amended ("Act"), in connection with a fundraiser held in honor of Senator Harry Reid by Tate Snyder Kimsey Architects, Ltd. ("TSKA") on February 17, 2009 ("Reid Fundraiser"). The Complainant, Randy L. Spitzmesser, a former employee and shareholder of TSKA, alleges that Respondents Windom Kimsey and William Snyder, Principals of TSKA, illegally reimbursed him and other individuals for political contributions made to Friends for Harry Reid, the principal campaign committee for Senator Harry Reid ("Reid Committee").

A corporation is prohibited from making a contribution in connection with a federal election, and no officer or director of any corporation may consent to any contribution by the corporation. *See* 2 U.S.C. § 441b(a); 11 C.F.R. § 114.2(b). The Act also prohibits a person from making a contribution in the name of another or knowingly permitting his or her name to be used to effect such a contribution. *See* 2 U.S.C. § 441f; 11 C.F.R. § 110.4.

Robert Boyle, a Project Architect at TSKA, attended the Reid Fundraiser and contributed \$1,000 to the Reid Committee. *See* Boyle Response at 1; Boyle Decl. at ¶ 4. He states that he made this contribution using his personal American Express card, which he paid using personal funds, and was not reimbursed. *See* Boyle Response at 1-2; Boyle Decl. at ¶¶ 4, 6. We have no information that would suggest otherwise. Accordingly, the Commission finds no reason to believe that Robert Boyle violated 2 U.S.C. § 441f.

**FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS**

**Respondent:** Dwayne Miller

**MUR:** 6215

The Complaint in this matter alleges violations of the Federal Election Campaign Act, as amended ("Act"), in connection with a fundraiser held in honor of Senator Harry Reid by Tate Snyder Kimsey Architects, Ltd. ("TSKA") on February 17, 2009 ("Reid Fundraiser"). The Complainant, Randy L. Spitzmesser, a former employee and shareholder of TSKA, alleges that Respondents Windom Kimsey and William Snyder, Principals of TSKA, illegally reimbursed him and other individuals for political contributions made to Friends for Harry Reid, the principal campaign committee for Senator Harry Reid ("Reid Committee").

A corporation is prohibited from making a contribution in connection with a federal election, and no officer or director of any corporation may consent to any contribution by the corporation. *See* 2 U.S.C. § 441b(a); 11 C.F.R. § 114.2(b). The Act also prohibits a person from making a contribution in the name of another or knowingly permitting his or her name to be used to effect such a contribution. *See* 2 U.S.C. § 441f; 11 C.F.R. § 110.4.

Dwayne Miller, the president and minority owner of JBA Consulting Engineers, Inc., attended the Reid Fundraiser and contributed \$1,000 directly to the Reid Committee. *See* Miller Response at 1-2; Miller Decl. at ¶¶ 5-7. He states that his check was drawn from personal funds on his personal bank account, and he denies being reimbursed by TSKA. *See* Miller Response at 2; Miller Decl. at ¶¶ 5, 7. We have no information that would suggest otherwise. Accordingly, the Commission finds no reason to believe that Dwayne Miller violated 2 U.S.C. § 441f.

**FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS**

**Respondent: Greg Gordon**

**MUR: 6215**

The Complaint in this matter alleges violations of the Federal Election Campaign Act, as amended ("Act"), in connection with a fundraiser held in honor of Senator Harry Reid by Tate Snyder Kimsey Architects, Ltd. ("TSKA") on February 17, 2009 ("Reid Fundraiser"). The Complainant, Randy L. Spitzmesser, a former employee and shareholder of TSKA, alleges that Respondents Windom Kimsey and William Snyder, Principals of TSKA, illegally reimbursed him and other individuals for political contributions made to Friends for Harry Reid, the principal campaign committee for Senator Harry Reid ("Reid Committee").

A corporation is prohibited from making a contribution in connection with a federal election, and no officer or director of any corporation may consent to any contribution by the corporation. *See* 2 U.S.C. § 441b(a); 11 C.F.R. § 114.2(b). The Act also prohibits a person from making a contribution in the name of another or knowingly permitting his or her name to be used to effect such a contribution. *See* 2 U.S.C. § 441f; 11 C.F.R. § 110.4.

Greg Gordon, a structural engineer and owner of Greg Gordon & Associates, did not attend the Reid Fundraiser but contributed \$1,000 directly to the Reid Committee by personal check. *See* Gordon Response at 1; Gordon Decl. at ¶ 5. He states that the check was drawn from funds in his personal bank account, which he shares with his wife, and that he was not reimbursed for this contribution. *See* Gordon Response at 1-2; Gordon Decl. at ¶¶ 5, 7. We have no information that would suggest otherwise. Accordingly, the Commission finds no reason to believe that Greg Gordon violated 2 U.S.C. § 441f.

**FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS**

**Respondent: Maizie Pusich**

**MUR: 6215**

15044384639  
The Complaint in this matter alleges violations of the Federal Election Campaign Act, as amended ("Act"), in connection with a fundraiser held in honor of Senator Harry Reid by Tate Snyder Kimsey Architects, Ltd. ("TSKA") on February 17, 2009 ("Reid Fundraiser"). The Complainant, Randy L. Spitzmesser, a former employee and shareholder of TSKA, alleges that Respondents Windom Kimsey and William Snyder, Principals of TSKA, illegally reimbursed him and other individuals for political contributions made to Friends for Harry Reid, the principal campaign committee for Senator Harry Reid ("Reid Committee").

A corporation is prohibited from making a contribution in connection with a federal election, and no officer or director of any corporation may consent to any contribution by the corporation. *See* 2 U.S.C. § 441b(a); 11 C.F.R. § 114.2(b). The Act also prohibits a person from making a contribution in the name of another or knowingly permitting his or her name to be used to effect such a contribution. *See* 2 U.S.C. § 441f; 11 C.F.R. § 110.4.

Maizie Pusich, the wife of a TSKA architect, did not attend the Reid Fundraiser but contributed \$500 to the Reid Committee. *See* Pusich Response at 1-2; Pusich Decl. at ¶ 3. She states that this contribution was made by personal check drawn on her joint account, which she shares with her husband, and was not reimbursed. *See* Pusich Response at 2; Pusich Decl. at ¶¶ 3-4. We have no information that would suggest otherwise. Accordingly, the Commission finds no reason to believe that Maizie Pusich violated 2 U.S.C. § 441f.